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Via ECF

May 6, 2025

The Honorable George B. Daniels
Daniel Patrick Moynihan United States Courthouse
U.S. District Court for the Southern District of New York
500 Pearl Street, Courtroom 11A
New York, NY 10007

The Honorable Sarah Netburn
Thurgood Marshall United States Courthouse
U.S. District Court for the Southern District of New York
40 Foley Square, Room 430
New York, NY 10007

*Re: In re Terrorist Attacks on September 11, 2001, No. 03-MDL-1570 (GBD) (SN);
Horace Morris, et al. v. Islamic Republic of Iran, No. 1:18-cv-05321 (GBD)(SN);
Laurence Schlissel, et al. v. Islamic Republic of Iran, No. 1:18-cv-05331 (GBD)(SN);
Audrey Ades, et al. v. Islamic Republic of Iran, No. 1:18-cv-07306 (GBD)(SN); Lloyd
A. Abel Sr., et al. v. Islamic Republic of Iran, No. 1:18-cv-11837 (GBD)(SN);
Alexander Jimenez, et al. v. Islamic Republic of Iran, No. 1:18-cv-11875 (GBD)(SN);
Cheryl Rivelli, et al. v. Islamic Republic of Iran, No. 1:18-cv-11878 (GBD)(SN);
Marinella Hemenway, et al. v. Islamic Republic of Iran, No. 1:18-cv-12277
(GBD)(SN); Matthew Rowenhorst, et al. v. Islamic Republic of Iran, No. 1:18-cv-
12387 (GBD)(SN); BNY Mellon, et al. v. Islamic Republic of Iran, No. 1:19-cv-11767
(GBD)(SN); August Bernaerts, et al. v. Islamic Republic of Iran, No. 1:19-cv-11865
(GBD)(SN); Jeanmarie Hargrave, et al. v. Islamic Republic of Iran, No. 1:20-cv-
09387 (GBD)(SN); Paul Asaro, et al. v. Islamic Republic of Iran, No. 1:20-cv-10460
(GBD)(SN); Nicole Amato, et al. v. Islamic Republic of Iran, No. 1:21-cv-10239
(GBD)(SN); Susan M. King, et al. v. Islamic Republic of Iran, No. 1:22-cv-05193
(GBD)(SN); Justin Strauss, et al. v. Islamic Republic of Iran, No. 1:22-cv-10823
(GBD)(SN); Celestine Kone, et al. v. Islamic Republic of Iran, No. 1:23-cv-05790
(GBD)(SN); Gladys Lopez, et al. v. Islamic Republic of Iran, No. 1:23-cv-08305
(GBD)(SN) – Updated Exhibit C for Proposed Order at MDL ECF No. 10527-3*

Dear Judges Daniels and Netburn:

I write to inform the Court that an additional quality control step my firm has implemented revealed a typo in the Proposed Order for the Iran judgment motion, currently

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pending at ECF No. 10524. Specifically, line 12 of Exhibit C to the Proposed Order at MDL ECF No. 10527-3 inadvertently omitted a request for pain and suffering damages for the Estate of Luis Manuel Lopez. Attached hereto is an updated Exhibit C to the Proposed Order at MDL ECF No. 10527, which correctly includes pain and suffering damages for the Estate of Luis Manuel Lopez. We respectfully request that the Court use this Exhibit C in lieu of the one filed at MDL ECF No. 10527-3.

We thank the Court for its attention to this matter.

Respectfully submitted,

/s/ Jerry S. Goldman
Jerry S. Goldman, Esq.

Attorney for the Plaintiffs

Cc (via ECF): All MDL Counsel of Record

Enclosure